

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
AMERICAN HEALTH FOUNDATION,)
INC.; AHF MANAGEMENT)
CORPORATION;)
AHF MONTGOMERY, INC. d/b/a/)
CHELTENHAM NURSING AND)
REHABILITATION CENTER; and)
AHF OHIO, INC. d/b/a THE)
SANCTUARY AT WILMINGTON)
PLACE and d/b/a SAMARITAN CARE)
CENTER AND VILLA,)
)
Defendants.)

Case No: 2:22-cv-02344-RBS

JOINT MOTION TO FURTHER STAY PROCEEDINGS

American Health Foundation Inc., AHF Management Corporation, AHF Montgomery, Inc. d/b/a Cheltenham Nursing and Rehabilitation Center, and AHF Ohio, Inc. d/b/a The Sanctuary at Wilmington Place and d/b/a Samaritan Care Center and Villa (collectively, “Defendants”), along with the United States (collectively, “the Parties”) jointly move to stay proceedings in this matter for an additional thirty (30) days, from May 5, 2025, up to and including June 5, 2025. The Parties have reached an agreement in principle to resolve this action and believe that the requested stay would facilitate finalizing the details of the settlement. The Court has the authority to grant the stay under its inherent authority to manage its own docket to promote “economy of time and effort for itself, for counsel, and for litigants.” *E.g. Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936).

The Parties request that this stay include, but not be limited to, a suspension of all hearings, discovery, and of the deadlines for filing further pleadings and conducting pretrial or scheduling conferences. This is the third request for adjournment that the Parties have jointly requested.

Good cause exists to grant the stay. The Parties are engaged in productive negotiations and are making progress towards finalizing the details of the settlement. Therefore, the Parties wish to suspend this litigation to enable additional discussions, avoid incurring unnecessary legal fees, and conserve judicial resources. If the Parties have not reached a settlement within thirty days, they will return to the Court to either seek an additional suspension or request a resumption of the lawsuit.

A proposed Order is attached.

Respectfully submitted,

Dated: May 2, 2025

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Acting Assistant Attorney General

/s/Benjamin Young
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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2025, I electronically filed the foregoing instrument with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Benjamin Young
Benjamin Young
Attorney for the United States